

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

JO ANN FONZONE AKA JUDY MC GRATH,
PLAINTIFF

VS.

12-5726
CIVIL ACTION
JURY TRIAL DEMANDED

JOE OTERI, ET AL,
DEFENDANTS

PLAINTIFF'S MOTION TO OBJECT OF VIDEOTAPING OF DEPOSITION

Plaintiff Jo Ann Fonzone aka Judy Mc Grath, by and through her attorney hereby requests that this Court grant her Motion of objection to defendant's videotaping her deposition for the following reasons:

1. Plaintiff has a Permanent Protection From Abuse Order from her estranged spouse and is in continuous fear of retaliation and injury as they are legally separated but not yet divorced.
2. Several years ago, Plaintiff was deposed in another matter and the deposition was videotaped.
3. Though Plaintiff strongly objected to the videotaping of her deposition, filed said Objections, the Court allowed defense attorney to videotape her deposition.
4. At the deposition, Plaintiff expressed her discontent and objection and told defense attorney, " If I suffer any physical harm because my face is on tape, this tape

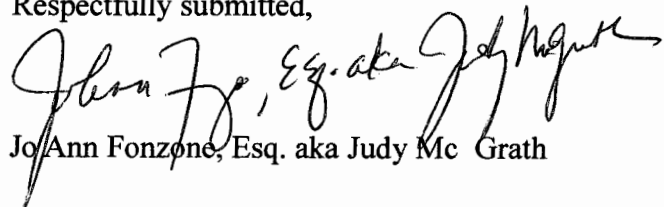
gets into the wrong hands , into hands of people trying to harm me and I dont know who your client is associated with , I will hold you personally responsible for any injuries."

5. Several years later, Plaintiff suffered even more serious injuries , has a physical disability , heart conditin, and another defense attorney wants a videotape deposition.
6. Plaintiff is an abuse and retaliation survivor, has battered woman syndrome and PTSD, and will not again be subjected to further harm and injury for anyone or any lawyer who insists on a videotape deposition.

WHEREFORE, Plaintiff respectfully requests that the Court grant her Motion to prohibit any videotaped deposition of her by defense in this personal injury action.

March 18, 2016

Respectfully submitted,



Jo Ann Fonzzone, Esq. aka Judy Mc Grath

For the Plaintiff

CERTIFICATE OF SERVICE

I Jo Ann Fonzone aka Judy Mc Grath hereby certify that I have caused to be served a true and correct copy of the Motion for Stay of Proceedings to the parties as set forth below:

AND
Motion to Object to VI DEPOSITION

Phila. Law Department
Aaron Shotland, Esq.
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By:

Jo Ann Fonzone aka Judy McGrath
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LEHIGH VALLEY PA, 180

15 MAR 2016 PM 11



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Eastern District of PA
601 Market St.
Philadelphia, PA
19106

U.S.M.S.
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